

REMARKS

I. Formalities

Applicants thank the Examiner for indicating that the Formal Drawings filed on March 29, 2004 are accepted.

However, Applicants note that the Examiner did not acknowledge the claim for priority under 35 U.S.C. § 119, and did not acknowledge receipt of the certified copies of the priority documents submitted on March 29, 2004. Accordingly, Applicants respectfully request that the Examiner acknowledge the claim for priority under 35 U.S.C. § 119, and acknowledge receipt of the aforementioned priority documents with the next office paper.

Moreover, the Examiner did not sign and forward a copy of the PTO 1449 Form submitted by Applicants with the Information Disclosure Statement filed on May 25, 2004. Thus, Applicants respectfully request that the Examiner sign the aforementioned PTO 1449 Form, initial the references cited therein, and return it along with the next office paper.

II. Status of the Application

Claims 1-20 are all the claims pending in the Application, with claim 1 being in independent form. Claims 1-20 have been rejected.

The present Response addresses each point of objection and rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

III. Claim Rejections under 35 U.S.C. §103 – Ouchi in view of Dewald

The Examiner has rejected claims 1-14 and 20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,493,149 to Ouchi (hereinafter “Ouchi”), in view of

RESPONSE UNDER 37 C.F.R. § 1.111
Attorney Docket No. Q74903

U.S. Application No. 10/811,375

U.S. Patent Publication No. 2002/0135862 to Dewald (hereinafter "Dewald"). Applicants respectfully traverse this rejection for *at least* the independent reasons stated below.

In order for the Examiner to maintain a rejection under 35 U.S.C. §103, Ouchi, Dewald, or some combination thereof, must teach or suggest all of the limitations of claims 1-14 and 20. Applicants respectfully submit that neither Ouchi, Dewald, nor any combination thereof, teaches or suggests all of the limitations of claims 1-14 and 20.

Independent claim 1 recites a combination including (among other things):

...a scrolling unit, comprising at least one lens cell...

The Examiner acknowledges that Ouchi fails to teach the above feature. (06/02/05 Office Action, page 3). Nevertheless, the grounds of rejection apply the cited Dewald reference, alleging that Dewald teaches or suggests this feature. (06/02/05 Office Action, page 3). Applicants respectfully disagree with the grounds of rejection.

Neither Ouchi, Dewald, nor any combination thereof, teaches or suggests the feature of a scrolling unit, comprising at least one lens cell, as recited in claim 1. In contrast to the requirements of claim 1, Dewald is generally directed to an illumination system for scrolling color recycling. More particularly, Dewald teaches a spiral color wheel, as illustrated in Figure 2, which acts as a dynamic filter. (See Figure 2). As taught in Dewald, "[t]he dynamic filter is typically a set of moving dichroic filters, such as a color wheel. Each filter in the dynamic filter has a pass band in which light of a range of wavelengths is selected, in this case transmitted, while out of band light is rejected, in this case reflected." (Para. 0030).

Thus, as illustrated in Figures 1 and 2 of Dewald, a light source emits light through a light recycler to the color wheel acting as a dynamic filter. (See Figure 1 and Figure 2). Dewald further teaches that each spiral of the color wheel transmits one band of wavelengths of light and reflects all other wavelengths back to the light recycler. While the color wheel taught in Dewald appears to comprise spirally arranged dichroic filters, there is no teaching or suggestion whatsoever regarding a scrolling unit, comprising at least one lens cell, as recited in claim 1.

Therefore, Applicants respectfully submit that independent claim 1 is patentable over Ouchi, Dewald, and any combination thereof, for *at least* these independent reasons. Further, Applicants respectfully submit that dependent claims 2-14 and 20 are allowable, *at least* by virtue of their dependency. As such, Applicants respectfully request that the Examiner withdraw this rejection.

IV. Claim Rejections under 35 U.S.C. §103 – Ouchi in view of Dewald and further in view of Bierhuizen

The Examiner has rejected claims 15 and 16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ouchi, in view of Dewald, and further in view of U.S. Patent No. 6,839,095 to Bierhuizen et al., (hereinafter “Bierhuizen”). Applicants respectfully traverse these rejections for *at least* the independent reasons stated below.

Dependent claims 15 and 16 incorporate all the novel and non-obvious recitations of their base claim 1. For *at least* the reasons set forth above, neither Ouchi, Dewald, nor any combination thereof, teaches or suggests all the recitations of claim 1. What is more, Bierhuizen fails to remedy the above-mentioned deficiencies. Consequently, Applicants respectfully submit that the dependent claims 15 and 16 are patentable over Ouchi, Dewald, Bierhuizen, and any

combination thereof, *at least* by virtue of their dependency on independent claim 1.

Accordingly, Applicants respectfully request that the Examiner withdraw these rejections.

V. Claim Rejections under 35 U.S.C. §103 – Ouchi, in view of Dewald, further in view of Bierhuizen, and further in view of Ito

The Examiner has rejected claims 17 and 18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ouchi, in view of Dewald, further in view of Bierhuizen, and further in view of U.S. Patent Publication No. 2002/0180933 to Ito (hereinafter “Ito”). Applicants respectfully traverse these rejections for *at least* the independent reasons stated below.

Dependent claims 17 and 18 incorporate all the novel and non-obvious recitations of their base claim 1. For *at least* the reasons set forth above, neither Ouchi, Dewald, Bierhuizen, nor any combination thereof, teaches or suggests all the recitations of claim 1. Moreover, Ito fails to remedy the above-mentioned deficiencies. As a result, Applicants respectfully submit that the dependent claims 17 and 18 are patentable over Ouchi, Dewald, Bierhuizen, Ito, and any combination thereof, *at least* by virtue of their dependency on independent claim 1. Hence, Applicants respectfully request that the Examiner withdraw these rejections.

VI. Claim Rejections under 35 U.S.C. §103 – Ouchi in view Shahzad

The Examiner has rejected claim 19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ouchi, in view of U.S. Patent Publication No. 2002/0191154 to Shahzad et al., (hereinafter “Shahzad”). Applicants respectfully traverse this rejection for *at least* the independent reasons stated below.

Dependent claim 19 incorporates all the novel and non-obvious recitations of its base claim 1. For *at least* the reasons set forth above Ouchi fails to teach or suggest all the recitations of claim 1. Moreover, Shahzad fails to remedy the above-mentioned deficiencies. As a result, Applicants respectfully submit that the dependent claim 19 is patentable over Ouchi, Shahzad, and any combination thereof, *at least* by virtue of its dependency on independent claim 1. Therefore, Applicants respectfully request that the Examiner withdraw this rejection.

VII. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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